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Attorneys for Plaintiff  
14 UNITED STATES OF AMERICA

15 UNITED STATES DISTRICT COURT  
16 FOR THE CENTRAL DISTRICT OF CALIFORNIA

17 United States of America,  
18 Plaintiff,  
19 v.  
20 ANDREW LEFT,  
21 Defendant.

No. 2:24-CR-00456-TJH

STIPULATION REGARDING REQUEST FOR  
(1) CONTINUANCE OF TRIAL DATE AND  
(2) FINDINGS OF EXCLUDABLE TIME  
PERIODS PURSUANT TO SPEEDY TRIAL  
ACT

**CURRENT TRIAL DATE:** 09/30/2025  
**PROPOSED TRIAL DATE:** 03/17/2026

24 Plaintiff United States of America, by and through its counsel  
25 of record, the United States Attorney for the Central District of  
26 California and Assistant United States Attorneys Brett Sagel and  
27 Alexander Schwab and the U.S. Department of Justice, Criminal  
28 Division Fraud Section and Trial Attorneys Lauren Archer and Matthew

1 Reilly, and defendant Andrew Left ("defendant"), both individually  
2 and by and through his counsel of record, James Spertus, Lindsey Hay,  
3 and Mario Hoang Nguyen hereby stipulate as follows:

4 1. The Indictment in this case was filed on July 25, 2024.  
5 Defendant first appeared before a judicial officer of the court in  
6 which the charges in this case were pending on July 29, 2024. The  
7 Speedy Trial Act, 18 U.S.C. § 3161, originally required that the  
8 trial commence on or before October 7, 2024.

9 2. Defendant is released on bond pending trial. The parties  
10 estimate that the trial in this matter will last approximately twelve  
11 days.

12 3. On September 4, 2024, the Court issued an Order setting  
13 trial for September 30, 2025 and excluding time under the Speedy  
14 Trial Act until that date.

15 4. By this stipulation, defendant moves to continue the trial  
16 date to March 17, 2026. This is the second request for a  
17 continuance.

18 5. The parties further agree to the following pretrial  
19 deadlines:

20 a. As currently scheduled, the hearing on defendant's  
21 Motion to Dismiss will be held on May 5, 2025.

22 b. All other pre-trial motions, including any motion for  
23 a Bill of Particulars if necessary, shall be filed by July 7, 2025;  
24 oppositions shall be filed by July 28, 2025; and optional replies  
25 shall be filed by August 4, 2025. A hearing on any pretrial motions  
26 shall occur on August 18, 2025, or a subsequent date set by the  
27 Court.  
28

1 c. The deadline for providing notice under Rule 404(b) of  
2 the Federal Rules of Evidence and disclosure of expert witnesses  
3 shall be September 15, 2025; optional rebuttal expert disclosures  
4 shall be provided by October 13, 2025.

5 d. All motions concerning expert witnesses shall be filed  
6 by October 27, 2025; oppositions shall be filed by November 17, 2025;  
7 and optional replies shall be filed by November 24, 2025. A hearing  
8 on experts shall be held on December 15, 2025.

9 e. All motions in limine shall be filed by January 26,  
10 2026; oppositions shall be filed by February 9, 2026; and optional  
11 replies shall be filed by February 17, 2026. A pretrial conference  
12 and hearing on motions in limine shall occur on March 2, 2026, or a  
13 subsequent date set by the Court.

14 6. Defendant requests the continuance based upon the following  
15 facts, which the parties believe demonstrate good cause to support  
16 the appropriate findings under the Speedy Trial Act:

17 a. Defendant is charged with violations of 18 U.S.C.  
18 § 1348(1) (securities fraud), 15 U.S.C. §§ 78j(b), 78ff, 17 C.F.R.  
19 § 240.10b-5 (securities fraud), and 18 U.S.C. § 1001(a)(2) (false  
20 statements). The government has produced voluminous discovery to the  
21 defense to date, including approximately 3 terabytes of data,  
22 including hundreds of thousands of documents, which include  
23 investigative reports, witness interviews, financial records, trading  
24 records, communications, and other materials.

25 b. Due to the nature of the prosecution, including the  
26 charges in the indictment and voluminous discovery, defense counsel  
27 represent that additional time is necessary to confer with the  
28 defendant, conduct and complete an independent investigation of the

1 case, conduct and complete additional legal research including for  
2 potential pre-trial motions, and review the discovery and potential  
3 evidence in the case, and prepare for trial. Defense counsel  
4 represents that failure to grant the continuance would deny them  
5 reasonable time necessary for effective preparation, taking into  
6 account the exercise of due diligence.

7 c. On January 27, 2025, defendant filed a motion to  
8 dismiss. The motion remains pending before the court, and is  
9 scheduled to be heard on May 5, 2025.

10 d. Defendant believes that failure to grant the  
11 continuance will deny him adequate representation.

12 e. The government does not object to the continuance.

13 f. The requested continuance is not based on congestion  
14 of the Court's calendar, lack of diligent preparation on the part of  
15 an attorney for the government or the defense, or failure on the part  
16 of the attorney for the government to obtain available witnesses.

17 7. For purposes of computing the date under the Speedy Trial  
18 Act by which defendant's trial must commence, the parties agree that  
19 the time period of April 1, 2025 to March 17, 2026, inclusive, should  
20 be excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(i), and  
21 (h)(7)(B)(iv) because the delay results from a continuance granted by  
22 the Court at defendant's request, without government objection, on  
23 the basis of the Court's finding that: (i) the ends of justice served  
24 by the continuance outweigh the best interest of the public and  
25 defendant in a speedy trial; (ii) failure to grant the continuance  
26 would be likely to make a continuation of the proceeding impossible,  
27 or result in a miscarriage of justice; and (iii) failure to grant the  
28 continuance would deny defense counsel the reasonable time necessary

1 for effective preparation, taking into account the exercise of due  
2 diligence.

3 8. In addition, the parties agree that the time period of  
4 January 27, 2025 to the date of the Court's ruling on defendant's  
5 motion to dismiss (ECF No. 34), inclusive, should be excluded  
6 pursuant to 18 U.S.C. § 3161(h)(1)(D), because it constitutes a delay  
7 resulting from a pretrial motion, from the filing of the motion  
8 through the prompt resolution of the motion.

9 9. Nothing in this stipulation shall preclude a finding that  
10 other provisions of the Speedy Trial Act dictate that additional time  
11 periods be excluded from the period within which trial must commence.  
12 Moreover, the same provisions and/or other provisions of the Speedy  
13 Trial Act may in the future authorize the exclusion of additional  
14 time periods from the period within which trial must commence.

15 IT IS SO STIPULATED.

16 Dated: April 2, 2025

17 Respectfully submitted,

18 JOSEPH T. MCNALLY  
19 Acting United States Attorney

LORINDA I. LARYEA  
Acting Chief, Fraud Section


20 LINDSEY GREER DOTSON  
21 Assistant United States Attorney  
22 Chief, Criminal Division

23 /s/  
ALEXANDER B. SCHWAB  
BRETT A. SAGEL

24 Attorneys for Plaintiff  
25 UNITED STATES OF AMERICA  
26  
27  
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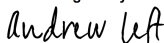
/s/  
LAUREN ARCHER  
MATTHEW REILLY  
Trial Attorneys  
Fraud Section  
Criminal Division  
U.S. Department of Justice

1 I am ANDREW LEFT's attorney. I have carefully discussed every  
2 part of this stipulation and the continuance of the trial date with  
3 my client. I have fully informed my client of his Speedy Trial  
4 rights. To my knowledge, my client understands those rights and  
5 agrees to waive them. I believe that my client's decision to give up  
6 the right to be brought to trial earlier than March 17, 2026, is an  
7 informed and voluntary one.

8  
9   
10 JAMES SPERTUS  
11 Attorney for Defendant  
12 ANDREW LEFT

April 1, 2025  
DATE

13 I have read this stipulation and have carefully discussed it  
14 with my attorney. I understand my Speedy Trial rights. I voluntarily  
15 agree to the continuance of the trial date and give up my right to be  
16 brought to trial earlier than March 17, 2026. I understand that I  
17 will be ordered to appear in Courtroom 9C of the Federal Courthouse,  
18 350 W. 1st Street, Los Angeles, California on March 17, 2026, at  
19 10:00 a.m.

20 DocuSigned by:  
21   
22 14560A449G92471...  
23 ANDREW LEFT  
24 Defendant

4/1/2025  
DATE